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August 21, 2018

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Appeal on behalf of the South Dakota Department of Education regarding Denial of Service Substitution Request, SLD Revised Funding Commitment Decisions Letter dated June 22, 2018, CC Docket No. 02-6, WC Docket No. 13-184

Dear Secretary Dortch:

The South Dakota Department of Education, Billed Entity Number 134238, appeals the Revised Funding Commitment Decisions Letter (RFCDL) dated June 22, 2018 for FRN 1699140455 in which the E-rate Program Administrator, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) denied the request for a corrective service substitution. The RFCDL is attached as Exhibit 1.

The service substitution was for one particular line item, FRN 1699140455.002. The line item was approved on the original Funding Commitment Decisions Letter as Dark Fiber Service (without any special construction) for 12 months of service, from July 2016 through June 2017.

Due to a delay in provisioning of the new leased dark fiber service, the first six months of service for this line item was leased **lit** fiber service, from July 2016 through December 2016. Leased lit fiber service was the same service that had been provided to the recipient of service under the previous agreement in effect with the same vendor through June 30, 2016.

This delayed provisioning of service was discovered after the last day of the funding year (June 30, 2017) during the preparation of the Billed Entity Applicant Reimbursement (BEAR) FCC Form 472. When this was discovered, the applicant tried to submit a service substitution for the FRN line item inside the E-rate online filing portal, EPC. The FRN, however, did not appear in EPC and the service substitution was unable to be submitted per the usual process. SLD informed the applicant that FRNs no longer appear in EPC under the service substitution module after the last day of service for the funding year. This limitation makes it impossible to submit a corrective service substitution using the EPC functionality.

When this issue was explained to SLD's management team, the applicant was advised by SLD to submit an appeal and make clear that the appeal was in fact a service substitution. Per the SLD's web site guidance (Exhibit 2), a *correcting* service substitution *is* permitted to be submitted after the last day of service for the FRN:

If the applicant discovers that products or services delivered are different from those approved on the FCC Form 471, the applicant should file a correcting service substitution

even if the discovery occurs after the last day to receive service. To ensure that a late-filed request is processed, applicants should prominently indicate that the request is a "correcting service substitution.

On February 2, 2018, the applicant submitted the appeal per SLD's instruction. Please refer to Exhibit 3. The correcting service substitution explained the circumstances underlying the request and quoted the SLD's web site guidance regarding correcting service substitutions.

On June 22, 2018, the RFCDL was issued for Appeal # 89023 (Exhibit 1), denying the request on the following grounds:

USAC has determined that your request does not qualify as a corrective service substitution since it involves a significant product type change splitting of originally funded FRN. As a result, your request is being treated as an appeal.

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 2/2/2018. The Funding Commitment Decision Letter was issued on 6/10/2017. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

The SLD's conclusion that this service substitution did not meet the requirements for a corrective service substitution was incorrect and should be overturned. Contrary to the SLD's statement, there is not a significant product type change between leased lit fiber and leased dark fiber service. Importantly, there was no special construction charges associated with the new dark fiber service.

Per the service substitution guidance on the SLD web site¹, the following factors are required to be met to qualify for a service substitution:

- The substituted services or products have the same functionality as the services or products contained in the original proposal.
- The substitution does not violate any contract provisions or any state or local procurement laws.
- The substitution does not result in an increase in the percentage of ineligible services or functions.
- The requested change is within the scope of the establishing FCC Form 470, including any Requests for Proposal (RFPs), for the original products and/or services.

All four of these factors are present in this situation. The leased dark fiber service and leased lit fiber service have the same functionality; the substitution does not violate any contract provisions or any state or local procurement laws; the substitution does not result in an increase of the percentage of ineligible services or functions and the requested change is within the scope of the establishing Form 470 including any RFPs.²

¹ https://www.usac.org/sl/applicants/before-youre-done/service-substitutions.aspx (last reviewed on August 21, 2018).

² Leased lit fiber and leased dark fiber (without special construction) were requested as part of the establishing Form 470 and associated RFP. The establishing Form 470 is 160001288. A service request was included for both leased lit fiber and leased dark fiber service. The RFP that was issued in conjunction with the Form 470 and uploaded to EPC provided for consideration of both dark fiber service in Section 6.5.2 and for leased lit fiber service (throughout the RFP; for example, see Section 3.2 Goals and Objectives).

Further, on December 15, 2010, the FCC issued Public Notice DA No. 10-2356 that included Frequently Asked Questions concerning the FCC's Sixth Report and Order in CC Docket No. 02-6 and explicitly recognized situations such as the present one, where there may be a delay in provisioning of new service. Applicants should be allowed to receive funding for the prior service until the new service is available.

The FCC stated:

Q: When an applicant is transitioning from one provider to another, there may be a delay in the transition. Given the SPIN change clarification discussed above, may applicants continue to split the FRN and switch back to their previous service provider until the new provider is able to provide service, even if the previous provider was not the second highest bidder?

A: Yes. An applicant may switch back to the previous service provider; however, the amount of funding that the service provider receives cannot exceed the amount that was initially requested on the applicant's FCC Form 471.

This Frequently Asked Question and Answer should be dispositive of this situation. This corrective service substitution request was submitted due to a delay in the provisioning of the new dark fiber service.³ The applicant simply requested to switch back to the previous service (and previous service provider which was the same vendor as the new service provider).

Further, it bears noting that 60 day appeal deadline has no application to the submission of the corrective service substitution. As noted above, the only reason that this request was submitted as an appeal was due to the limitations of the EPC system and its inability to accept and process the corrective service substitution in the appropriate manner.

For all of these reasons, the South Dakota Department of Education respectfully requests that its appeal be approved and that the FCC directs the SLD to process the corrective service substitution that was requested on February 2, 2018.

Respectfully submitted,

Lisa D. Rae Deputy Director Division of Finance

Division of Finance and Management South Dakota Department of Education 800 Governors Drive

800 Governors Drive Pierre, SD 57501 605 773 3248 phone 605 773 6139 fax

Lisa.d.rae@state.sd.us

Enclosures: Exhibits 1 - 3

³ There was no need to switch service providers because the same vendor provided the service under the old and new agreements. The applicant therefore requested a new line item to be added to the FRN for the six months of the dark fiber service.



June 22, 2018

Revised Funding Commitment Decision Letter

Post Commitment Wave: 50

Funding Year 2016

Contact Information: BEN: 134238

Debra Kriete
SOUTH DAKOTA STATE DEPT OF ED
800 GOVERNORS DR
PIERRE, SD 57501
dmkriete@comcast.net

Totals

Original Commitment Amount	\$12,060.00
Revised Commitment Amount	\$12,060.00

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2016 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

File the FCC Form 486, Service Confirmation and Children's Internet Protection Act (CIPA)
 Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please
 review the CIPA requirements and file the form(s).



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 If USAC approved funding on an FRN in your original FCDL, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).

- o If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
- 2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
 - If you (the applicant) are invoicing USAC: You must pay your service provider(s) the full cost for the services you receive and file the FCC Form 472, the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - If your service provider(s) is invoicing USAC: The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the <u>FCC Form 474</u>, the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs.
 Every funding year, service providers must file an <u>FCC Form 473</u>, the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - To receive an invoice deadline extension, the applicant or service provider must request an
 extension on or before the last date to invoice. If you anticipate, for any reason, that invoices
 cannot be filed on time, USAC will grant a one-time, 120-day invoice deadline extension if
 timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- To submit your appeal to USAC, visit the Appeals section in the E-rate Productivity Center (EPC)
 and provide the required information. USAC will reply to your appeal submissions to confirm receipt.
 Visit USAC's website for additional information on submitting an appeal to USAC, including step-by-step instructions.
- To request a waiver of the FCC's rules or appeal USAC's appeal decision, please submit
 it to the FCC in proceeding number CC Docket No. 02-6 using the <u>Electronic Comment Filing</u>
 <u>System</u> (ECFS). Include your contact information, a statement that your filing is a waiver request,



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identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



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Post Commitment Wave: 50

Revised Funding Commitment Decision Overview

Funding Year 2016

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1699140455	South Dakota Network, LLC	Appeals	\$12,060.00	Denied



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Post Commitment Wave: 50

Post Commitment Request Number:	Post Commitment Request Type:	Post Commitment Decision:
89023	Appeals	Denied

FRN:	Service Type: Data Transmission and/or Internet Access	Original Status:	Revised Status:
1699140455		Funded	Funded
FCC Form 471: 16106	0091		

Dollars Committed						
Monthly Cost		One-Time Cost				
Months of Service	12					
Total Eligible Recurring Charges \$18,000.00		Total Eligible One Time Charges	\$0.00			
Total Pre-Discount Charges		\$18,000.00				
Discount Rate		67.00%				
Revised Committed Amount		\$12,060.00				

Dates	
Service Start Date	7/1/2016
Contract Expiration Date	6/30/2018
Contract Award Date	2/10/2016
Service Delivery Deadline	6/30/2017
Expiration Date (All Extensions)	6/30/2021

Service Provider and Contract Information				
Service Provider	South Dakota Network,			
SPIN (498ID)	143002997			
Contract Number	SDNCOMMTRANSPORT 201601			
Account Number				
Establishing FCC Form 470	160001288			

Consultant Information				
Consultant Name	Debra Kriete			
Consultant's Employer	DEBRA M. KRIETE, ESQ.			
CRN	16043864			

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

USAC has determined that your request does not qualify as a corrective service substitution since it involves a significant product type change splitting of originally funded FRN. As a result, your request is being treated as an appeal. Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 2/2/2018. The Funding Commitment Decision Letter was issued on 6/10/2017. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter



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being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.



USAC Home | Schools and Libraries Program | Applicants | Before You're Done | Service Substitutions

BEFORE YOU'RE DONE

SPIN Changes Service Delivery Returning Funds to USAC Service Substitutions Transfer of Equipment **Updating Contact Information**

Commitment Adjustments Disposal or Trade-in of Equipment

FCC Form 500 Filing

Service Substitutions

Updated February 2017

A service substitution is a change in the products and/or services specified in the FCC Form 471, Description of Services Ordered and Certification Form. In certain limited circumstances, applicants or service providers may request and be approved for service substitutions. In addition, service providers or equipment manufacturers may submit a "global" service substitution.

Service substitutions encompass changes in the technical components (products, services, or both) specified in the FCC Form 471. Applicants who file service substitution requests must still comply with the deadlines for the FCC Form 486, Receipt of Service Confirmation and Children's Internet Protection Act Certification Form.

Criteria

Service or product substitutions must meet the following conditions, which are specified in FCC rules:

The substituted services or products have the same functionality as the services or products contained in the original proposal.

The substitution does not violate any contract provisions or state or local procurement laws.

The substitution does not result in an increase in the percentage of ineligible services or functions.

The requested change is within the scope of the establishing FCC Form 470, including any Requests for Proposal (RFP), for the original service.

If a service substitution results in a change in the pre-discount price for the supported service, Schools and Libraries (E-rate) Program funding will be based on the pre-discount price of the service for which support was originally requested or the pre-discount price of the new, substituted service, whichever is lower.

Example: USAC can approve an applicant's request to use 87 six-port network modules instead of a different brand of 58 eight-port network modules that were originally approved in the applicant's FCC Form 471.

How to Submit Your Request

Applicants must submit service substitution requests in the E-rate Productivity Center (EPC). For step-by-step instructions, refer to the EPC User Guide: Service Substitutions "...".

A service substitution is a minor modification to the original FCC Form 471. The certifications and representations made in the original application continue to apply. False statements on a service substitution request carry the same penalties as those indicated in the FCC Form 471 certifications.

Any cost change submitted by an applicant in a service substitution request will be considered a request for modification of the funding commitment, just as though the applicant had submitted an FCC Form 500, Funding Commitment Adjustment Request Form. Therefore, when USAC approves a request that includes a cost decrease, we will adjust the commitment for the affected funding request.

USAC Review

USAC review includes an evaluation of whether "same functionality" is maintained between the original and proposed new configuration, and whether the new configuration is eligible for funding. For service substitution requests involving Internal Connections, our review may first evaluate the substitution based on the function and product type for each line item in the "from" and "to" lists.

An Internal Connections service substitution request is deemed to meet FCC requirements for "same functionality" if the original and new configurations maintain consistent functions. For example, these service substitution requests meet the requirement for same functionality:

A network switch for a network router (Function: "data distribution")

A UPS for a tape backup (Function: "data protection")

USAC may only approve service substitution requests when FCC requirements for same functionality are met. USAC will respond in writing to the service substitution request, either approving the request or indicating the reason(s) why the request cannot be approved.

Deadlines

You should submit your service substitution requests after you receive a FCC Form 471 Receipt Acknowledgment Letter (RAL), and no sooner. USAC will dismiss any requests received prior to issuance of a RAL. If USAC has not completed the services portion of its application review when the substitution request is logged, then USAC will include the substitution request in the review.

The Funding Commitment Decision Letter (FCDL) includes a notation that USAC has incorporated the substitution request. If USAC has completed the services portion of its application review, we will review and act on the substitution request separately.

USAC must receive a service substitution request on or before the last day to receive service for that FRN. In general, the last day to receive service is:

June 30 of the relevant funding year for recurring services, and

September 30 that follows the close of the funding year for non-recurring services.

However, the deadline for the receipt of non-recurring services <u>may be extended</u> beyond the September 30 that follows the close of the funding year. If the deadline for receipt of these services is extended, the deadline for the service substitution request is automatically extended as well.

Making Corrections

If you need to make subsequent corrections to a service substitution, applicants and service providers must follow the normal service substitution procedures and timelines in order to obtain pre-approval of changes.

If USAC finds an unapproved change during the invoice review process, USAC may refuse to pay the invoice for products or services that were not originally requested. Furthermore, if, during an audit, USAC discovers different products or services from those approved, USAC may make a commitment adjustment and require that you return incorrectly disbursed funds.

If the applicant discovers that products or services delivered are different from those approved on the FCC Form 471, the applicant should file a correcting service substitution even if the discovery occurs after the last day to receive service. To ensure that a late-filed request is processed, applicants should prominently indicate that the request is a "correcting service substitution." However, applicants are strongly encouraged to file traditional and timely service substitutions when making changes in products and services whenever possible.

"Global" Service Substitutions

A "global" service substitution can involve a product and/or service that is being discontinued, has a model number change, or is being replaced. To make a "global" service substitution, the manufacturer or service provider must notify USAC of the change, along with a listing of one or more replacement products or services.

Note: "Global" service substitutions are only applicable when the product or service originally specified on the FCC Form 471 is no longer available, or is no longer being provided by the service provider making the request.

When you notify USAC, you must indicate that the new products or services are functionally equivalent to the product or service you are replacing, and that they have no increase in percentage of ineligible features. USAC encourages service providers to include a publicly-issued product announcement of the discontinuation or model number change in the letter with their request.

USAC will maintain the list of submitted substitute products and/or services. This approach will allow USAC to process future invoices with the replacement products or services, eliminating the need for many separate applicants to request the same service substitutions. Such service substitutions will not result in a change to an applicant's funding commitment.

There is no specific timeline for service providers and manufacturers to file "global" service substitutions. However, they should submit model changes as early as possible to avoid delays in invoice processing. USAC will respond in writing to the service substitution request, indicating whether the request can be granted or requesting additional information. Since a service provider-initiated service substitution does not reference any specific funding request, USAC does not automatically extend the service delivery deadline for funding requests that include these services. USAC does not provide a time extension for the completion of non-recurring services under this approach.

Service provider-initiated service substitutions are designed to accommodate replacements that USAC can substantiate as near-identical. Replacements that cannot be substantiated as near-identical cannot be accommodated with this approach. However, if a service provider is aware of similar changes among many of its customers, it can facilitate a service substitution among these customers by providing similar service substitution requests, which are consistent with the previous sections of this document, to the customer for them to submit and sign. Such similar requests may be sent in one request to USAC.

Applicants do not need to make any filing to USAC for a service substitution request that was initiated by a manufacturer or service provider. However, the change must be consistent with the establishing FCC Form 470, the RFP (if any), and state and local procurement laws. USAC recommends that service providers supply each affected applicant a copy of USAC's approval letter, and that applicants keep this copy on file in the event of an audit.

USAC's determination that it will process invoices with the replacement configuration does not change any contractual requirement between applicants and service providers. That is, applicants are not forced to accept a modified configuration that is not anticipated by an agreement or contract with their service provider.



The Universal Service Administrative Company (USAC) is dedicated to achieving universal service. As a not-for-profit corporation designated by the Federal Communications Commission (FCC), we administer the \$10 billion Universal Service Fund. With the guidance of the FCC policy, we collect and deliver funding through four programs that are focused specifically on places where broadband and connectivity needs are acute.

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Correcting Service Substitution FY 2016 Chester Area Cyber School -#89023



Summary

Associated FRNs

Review Inquiries

News

Related Actions

In-Review

Outreach

Wave Ready

Committed

Appeal Information

View Status (+)

Funding Year 2016

Submitting Organization SOUTH DAKOTA STATE DEPT OF ED (BEN:

134238)

Created By Debra Kriete

Created On 2/2/2018 1:20 PM EST

Main Contact

Name Debra Kriete

Email dmkriete@comcast.net

Phone Number 717-232-0222

Narrative

We tried to submit a "Correcting Service Substitution" for an FRN that has a service delivery deadline of June 30, 2017. EPC would not allow us to do this. We are submitting it instead as an appeal. Please note that the SLD web site allows for a correcting service substitution to be submitted after the service delivery deadline. It states: "If the applicant discovers that products or services delivered are different from those approved on the FCC Form 471, the applicant should file a correcting service substitution even if the discovery occurs after the last day to receive service. To ensure that a late-filed request is processed, applicants should prominently indicate that the request is a "correcting service substitution." However, applicants are strongly encouraged to file traditional and timely service substitutions when making changes in products and services whenever possible." http://usac.org/sl/applicants/before-youre-done/service-substitutions.aspx

The invoice deadline for this FRN is currently set to be 2/28/2018. We hope that this appeal/correcting service substitution will be processed before then. If not, we intend to submit the BEAR and if asked to submit supporting bills during PIA review, we will point to this appeal/correcting service substitution request. Thank you very much, Debra Kriete

Appeal Details

Decision appealed by applicant Funding Commitment Decision Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

View Supporting Documentation (+)

CORRECTING SERVICE SUBSTITUTION

Submitting Organization Details							
South Dakota Department of Ed	BEN 134238						
800 Governors Drive	FCC Registrati	FCC Registration Number 0014535314					
Pierre, SD 57501							
605 773 3134							
Service Substitution Details	Funding Voor						
Nickname Chaster Cyber School FV 16	Funding Year FY 2016						
Chester Cyber School FY 16	FY 2016						
Contact Information							
Main Contact Person	dmkriete@co	mcas	t.net				
Debra Kriete	717-232-0222						
FRN Line Item Details							
FRN	1699140455						
FRN Line Item	1699140455.0	001					
Namedia	The Chester And	- C. I	per School originally was scheduled to begin receiving dar	l. f:h			
Narrative		,	eer school originally was scheduled to begin receiving dar ever, the transition from Ethernet service to dark fiber se				
			til January 2017. Therefore, the service description for th	•			
			016 needs to be modified to be Ethernet service.				
			at EPC works, it appears that the FRN line item will need t				
			rill need to be created. The original line item, 169914045 atity of 1, and the recipient of service will be only the CLA				
			194. The line item cost must be reduced accordingly.	NK ELEWIENTANT			
			<i>5.</i>				
			40455.002 will be for 6 months of Ethernet service for Ch				
			y # 16078628, and New Line Item 1699140455.003 will be CHESTER AREA CYBER SCHOOL, Entity # 16078628.	e for 6 months of			
FROM (Original Request)			a already entered				
Service Details							
Purpose	Data connecti	Data connection(s) for an applicant's hub site to an Internet Service Provider or					
	state/regiona	state/regional network where Internet access service is billed separately					
Function	Fiber						
Type of Connection	Dark Fiber (No	Spe	cial Construction)				
Bandwidth Speed Details							
Bandwidth Download Speed	100						
Bandwidth Download Unit	Mbps						
Bandwidth Upload Speed	100						
Bandwidth Upload Speed	Mbps						
Monthly Cost			One Time Cost				
Monthly Recurring Unit Cost	750.0	_	One Time Unit Cost	0			
Monthly Recurring Unit Ineligible Costs		0	One Time Ineligible Unit Cost	0			
Monthly Recurring Unit Eligible	750.0	0	One Time Eligible Unit Cost	0			
Costs		_	One Time Occasion	_			
Monthly Quantity	_	2	One Time Quantity	0			
Total Monthly Eligible Recurring Costs	1500.0	U	Total Eligible One Time Costs	0			
Months of Service	1	2					
Total Eligible Recurring Costs	18000.0		Summary				
	10000.0	+	Total Eligible Recurring Costs	18000.00			
		\dashv	Total Eligible One Time Costs	0			
		\dashv	Pre-Discount Ext. Eligible Line Item Cost	18000.00			
		\top	5				
Recipient of Service	CLARK ELEMENTA	RY S	CHOOL, Entity 65994, Quantity of 1 line				
			SCHOOL, Entity 16078628, Quantity of 1 line				

LINE ITEM 1699140455.001				
TO:				
Service Details				
Purpose	Pro		nnection(s) for an applicant's hub site to an Int r or state/regional network where Internet acc ely	
Function	Fibe	er		
Type of Connection	Dar	k Fil	per (No Special Construction)	
Bandwidth Speed Details				
Bandwidth Download Speed	100)		
Bandwidth Download Unit	Mb	ps		
Bandwidth Upload Speed	100)		
Bandwidth Upload Speed	Mb	ps		
Monthly Cost			One Time Cost	
Monthly Recurring Unit Cost	750.00		One Time Unit Cost	0
Monthly Recurring Unit Ineligible Costs	0		One Time Ineligible Unit Cost	0
Monthly Recurring Unit Eligible Costs	750.00		One Time Eligible Unit Cost	0
Monthly Quantity	1		One Time Quantity	0
Total Monthly Eligible Recurring Costs	750.00		Total Eligible One Time Costs	0
Months of Service	12			
Total Eligible Recurring Costs	9000.00		Summary	
			Total Eligible Recurring Costs	
			Total Eligible One Time Costs	9000.00
			Pre-Discount Extended Eligible Line	
			Item Cost	
Recipient of Service	CLARK FLEN	_ ∕IFN	 TARY SCHOOL, Entity 65994, Quantity of 1 line	

LINE ITEM 1699140455.002						
TO:						
Service Details						
Purpose	Data connection(s) for an applicant's hub site to an Internet Service					
			or state/regional network where Internet acce	ess service is billed		
		separately				
Function	Fiber					
Type of Connection	Ethei	rne	t			
Bandwidth Speed Details						
Bandwidth Download Speed	100					
Bandwidth Download Unit	Mbps	S				
Bandwidth Upload Speed	100					
Bandwidth Upload Speed Mbps						
Monthly Cost			One Time Cost			
Monthly Recurring Unit Cost	750.00		One Time Unit Cost	0		
Monthly Recurring Unit Ineligible Costs	0		One Time Ineligible Unit Cost	0		
Monthly Recurring Unit Eligible Costs	750.00		One Time Eligible Unit Cost	0		
Monthly Quantity	1		One Time Quantity	0		
Total Monthly Eligible Recurring Costs	750.00		Total Eligible One Time Costs	0		
Months of Service	6					
Total Eligible Recurring Costs	4500.00		Summary			
			Total Eligible Recurring Costs			
			Total Eligible One Time Costs	4500.00		
			Pre-Discount Extended Eligible Line			
			Item Cost			
Recipient of Service	CHESTER ARE	EA (CYBER SCHOOL			
Entity #	16078628	16078628				
# Lines	1					

LINE ITEM 1699140455.003						
TO:						
Service Details						
Purpose	Data	Data connection(s) for an applicant's hub site to an Internet Service				
		Provider or state/regional network where Internet access service is billed				
		separately				
Function	Fiber					
Type of Connection	Dark	Fiber (No Special Construction)				
Bandwidth Speed Details						
Bandwidth Download Speed	100					
Bandwidth Download Unit	Mbps					
Bandwidth Upload Speed	100					
Bandwidth Upload Speed	Mbps					
Monthly Cost		One Time Cost				
Monthly Recurring Unit Cost	750.00	One Time Unit Cost	0			
Monthly Recurring Unit Ineligible Costs	0	One Time Ineligible Unit Cost	0			
Monthly Recurring Unit Eligible Costs	750.00	One Time Eligible Unit Cost	0			
Monthly Quantity	1	One Time Quantity	0			
Total Monthly Eligible Recurring Costs	750.00	Total Eligible One Time Costs	0			
Months of Service	6					
Total Eligible Recurring Costs	4500.00	Summary				
		Total Eligible Recurring Costs				
		Total Eligible One Time Costs	4500.00			
		Pre-Discount Extended Eligible Line				
		Item Cost				
Recipient of Service	CHESTER ARE	A CYBER SCHOOL				
Entity #	16078628					
# Lines	1					